



## BLUE GRANITE WATER COMPANY

### Customer Data Protection Guidelines

#### Summary

These guidelines (the “**Guidelines**”) describe the practices of Blue Granite Water Company (“**Blue Granite**” or the “**Company**”) with respect to the collection, use and disclosure of personal information and customer data.<sup>1</sup> The Guidelines apply to the personal information and customer data collected when customers visit websites, purchase products or services, contact the Company’s customer service department, or otherwise interact with Blue Granite.

Blue Granite is committed to protecting the privacy and confidentiality of all customer personal information and data. To this end, Blue Granite maintains standards designed to protect privacy and prevent the misuse of any customer data.

#### Definition of Customer Data

Customer data (or “personal data”) is information about an identifiable individual, as more particularly defined in applicable customer data protection laws, rules, or regulations, including S.C Code Ann. § 39-1-90(D)(3), S.C. Code Ann. § 16-13-510(D), and S.C. Code Ann. Regs. 103-823.2. Examples of customer data include items such as name, address, telephone number, email address, gender, date of birth, marital status, credit history, and social insurance and other personal identification numbers.

#### Customer Notice and Awareness

In advance of or in the process of requesting customer data, Blue Granite will provide sufficient disclosure to the customer of the (1) intended use of the data collected, (2) access or control available to the customer for the data collected, and (3) steps taken by Blue Granite to protect the data. Such disclosure may take the form of a notice/flyer/insert with the customer’s bill, notification on a website or app, communication by email or phone, or other similar method. Disclosures may also include any terms and conditions for use of Blue Granite applications.

Blue Granite will provide general notice to customers no less than annually of the following:

1. The methods used to inform customers that provided personal data will be protected and not shared with third parties without consent or only under limited circumstances
2. The limited circumstances in which Blue Granite would provide customer data to third parties
3. The ways in which customers may access, monitor, or modify their data

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<sup>1</sup> For purposes of the Guidelines, references to the Company include a reference to any affiliated company performing services on behalf of or for the benefit of the Company.



4. The appropriate contact methods for questions or needed corrections regarding customer data
5. The security and control procedures in place to protect customer data

Notice to customers of the above information may occur via email, electronic notification via Company applications, or flyer/notice/bill insert. The above general notice information will also be permanently posted to Blue Granite's website. Any updates to the Guidelines or other policies regarding customer data will be communicated timely to customers.

### **Customer Access, Choice and Consent**

Consent to the collection, use, and disclosure of personal data may be given in various ways and may be express or implied. Generally, by providing Blue Granite with personal data, Blue Granite will assume that an individual consents to the collection, use, and disclosure of personal data in connection with the delivery of water and sewer service and as required by law, subject to any limitations or terms of Blue Granite or applicable rules and regulations. Subject to legal or contractual requirements and reasonable notice, a customer may withdraw consent at any time by contacting Blue Granite as outlined below. Blue Granite will process and implement such requests within a reasonable amount of time. However, such requests may limit Blue Granite's ability to provide a customer with the optimal level of service or any service. A customer may not, for instance, withdraw the customer's consent to the collection of meter data that Blue Granite requires to provide bills for the services it delivers. Blue Granite will advise the customer of potential service limitations due to lack of consent and of any alternative options that may be available.

Blue Granite will retain a record of any limitation or withdrawal of consent within its customer records software.

Blue Granite does not provide customer data to third parties for any reasons other than those described below. Blue Granite may collect, use, or disclose customer data without customer knowledge or consent in limited circumstances, including, without limitation:

- When such collection, use, or disclosure is permitted or required by law;
- When use of information is for acting in an emergency that threatens an individual's life, health, or personal security, or to prevent damage to Blue Granite's or customer's property;
- When certain information is publicly available;
- When pursuing customer payment for services rendered or authorized customer deposit activity;
- When needing to address an anticipated breach of law; and



- When responding to service interruption, customer complaint, or service quality issues.

Blue Granite will honor a customer's reasonable request to review and update their customer data. There may be a nominal processing fee for such requests, and the customer will be notified if a fee will be required before processing such a request. Blue Granite will take reasonable steps to process these requests in a timely manner.

In certain situations, Blue Granite may not be able to provide access to any or all of a customer's personal data. In such cases, Blue Granite will explain in writing the reasons it will not provide the requested information and identify resources for redress available to the customer.

If a customer identifies that certain personal data is not accurate, the customer must promptly update such information to the extent access is available to do so. If direct customer access to modify personal data is not available, the customer must contact Blue Granite promptly to have the data corrected. Contact can take the form of an email or phone call to the Company's customer service department. General correspondence must not be used (such as Help or Contact Us features in Company applications or websites), as such methods are less secure and may not supply the needed correction to the proper Company personnel or department. Should personal data corrections necessitate providing an update to a third party under the circumstances noted above, Blue Granite will promptly provide such update.

### **Customer Data Use**

Blue Granite collects and uses customer data for purposes reasonably required for it to carry on business. The types of customer data collected by Blue Granite and the purposes for which it is used include the following:

- **To establish/maintain a business relationship.**  
Blue Granite will collect personal data such as name, address, telephone number, and email address from its customers and other individuals with whom Blue Granite carries on business to confirm identity and facilitate contact. Blue Granite may also collect credit card, bank, and credit information for customers to set up accounts and facilitate billing, credit, collections, and customer service activities.
- **To develop and improve products and services.**  
Blue Granite may collect customer data in connection with the products and services purchased or used by its customers to enhance them or to offer service recommendations or information on relevant products and services to those customers.
- **To understand customer needs and preferences.**  
Blue Granite may obtain customer data on customers' needs and preferences for the purpose of providing personalized service. For example, if a customer wishes to pay

bills electronically or be notified of upcoming rebate offers by email, the Company may ask for information to identify the customer's online identity (e.g., email address).

- **To assist an agent acting on a customer's behalf.**

Blue Granite may disclose information to an individual's agent (such as, for example, the individual's legal counsel or a government or non-profit agency supplying customer assistance services) if Blue Granite is satisfied that the agent is authorized to seek the information of the individual.

- **For quality assurance purposes.**

Blue Granite may record telephone discussions with its customer service representatives for quality assurance, security, investigations, and training purposes. Blue Granite may also engage a third party to perform customer surveys.

- **To manage Blue Granite's business and operations.**

Blue Granite may obtain and share customer data with their affiliates, third-party agents, consultants, or service providers to facilitate operations and provision of service to the customer. Blue Granite collects and analyzes information on customer usage of its products and services to better understand future customer requirements and assist in forecasting and planning activities. This data may also be used to assist Blue Granite in planning future system improvements and rate changes. Blue Granite may also collect and use personal data provided to Blue Granite to respond to requests, inquiries, comments and concerns and maintain records of correspondence, or as permitted or required by law or otherwise with customer consent.

- **Investigate Complaints.**

Blue Granite may collect and use personal data to investigate complaints and to respond to privacy breaches.

- **Legal Proceedings.**

Blue Granite may collect and use personal data to bring or defend against legal proceedings.

- **Video.**

Blue Granite may collect and use video surveillance in and around its offices, facilities, and other locations for the safety of its customers, employees, and third parties and to protect against theft, property damage, and fraud.

- **Applying for a position.**

Blue Granite may collect and use personal information if a customer applies for employment, including from the customer directly, as well as from the customer's prior employers and personal references.

- **To facilitate the development and delivery of additional services.**

Blue Granite may use aggregated and anonymized customer data for the purposes of developing and delivering other services to customers. In addition, Blue Granite may aggregate, anonymize, and transfer customer data to a third party to facilitate the delivery of unrelated (i.e., non-utility) services by the third party.

- **In specific situations.**

Blue Granite may acquire new businesses or sell or assign, merge, amalgamate, or transfer all or parts of its businesses. Since customer data associated with any accounts, products, or services of the business being purchased, sold, assigned, merged, amalgamated, or transferred will typically be included in such transactions, Blue Granite may disclose such information to such other entities as part of the transaction or pre-transaction review under a non-disclosure agreement.

### **Data Security**

The Company shall take appropriate and reasonable steps to store customer data in such a manner as to limit access to those persons permitted to receive it and shall require all persons with access to such information to protect its confidentiality. Employees with access to customer data are prohibited from making any improper indirect use of the data, including directing or encouraging any actions based on the customer data by employees who do not have access to such information.

The Company shall not provide customer data to a third party for a commercial or for-profit purpose. Only aggregate data, which shall not include personal data as defined in these Guidelines, shall be provided for such purposes. The Company shall aggregate data using its own employees or designated contractors and shall not provide customer data to a third party for aggregation. The Company will thoroughly review aggregated data to ensure it is devoid of unique personal information before sharing with a third party for any purpose except those limited circumstances outlined in these Guidelines or permitted by law.

The Company shall maintain an enterprise cybersecurity program that includes in its structure, but is not limited to, the following functions or features: internal control and audit, employee training, data encryption, monitoring, backup and recovery, incident response, and continuous improvement.

In order to improve its websites and applications on an ongoing basis, the Company may use cookies and similar technologies to track the visit and activities of users. The Company may also use cookies to remember users' choices when they are accessing the Company subsites for efficient return visits. A cookie is a small piece of data that is transferred to a user's computer (or other device used to access the internet) through a web browser and can be read by the websites that placed it. The Company cookies do not store personal data. Users can set their browsers to notify of cookies or disable cookies, but please note that some functions of these websites may not be available if cookies are disabled.



The Company may use Google Analytics or certain other third-party analytics services. The providers of these services may independently collect, use, and disclose user IP addresses together with information about user visits to these and other websites that they service in accordance with their own privacy policies. These services may use their own cookies and other data collection technologies. They may use this information in order to improve user experience, to gain a view of how people are using websites that they service so that improvements can be made, and as otherwise permitted in their privacy policies.

### **Accountability**

Customer data will be retained by Blue Granite in accordance with applicable laws and business requirements. Blue Granite will take reasonable steps to destroy or permanently de-identify customer data it holds if it is no longer needed for Blue Granite's business purposes or any applicable regulatory or legal requirements. Upon termination of employment, employees will return all Company equipment, documents, and correspondence in their possession that contain customer data.

Any employee who is found to have shared customer data in a manner inconsistent with these Guidelines is subject to discipline, including possible termination of the Company's employment relationship. An evaluation report will be prepared to assess (1) the cause of the unauthorized disclosure, (2) the extent of the employee's knowledge of the policies and Guidelines in place to protect customer data, and (3) the extent of customer data disclosure that occurred to estimate any risks or vulnerabilities. Blue Granite also will promptly communicate to their regulator the nature of the unauthorized disclosure and subsequent mitigation efforts, as well as notify the affected customers in writing. Depending on the nature of the disclosure, multiple status updates on the process of assessing and addressing the disclosure may be made to the regulator and customers.

All employees will participate in training programs related to data protection, such as cybersecurity and ethics programs, on at least an annual basis.

### **Controls for Sharing Customer Data**

The Company will include language in all third-party agreements that contemplates the sharing of customer data, including limitations on the third party's use of the data and standards with which the third party must comply regarding the storage and protection of such data. The Company will require that the third party either return or destroy customer data consistent with commercially reasonable terms commonly found in non-disclosure and confidentiality agreements.